

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 19-13264
Frank J. Peta, Jr.	:	Chapter 13
	:	Judge Magdeline D. Coleman
Debtor(s)	:	*****
	:	
PNC Bank, National Association	:	Related Document # 326
Movant,	:	Related Claim # 7
vs	:	
	:	
Frank J. Peta, Jr.	:	
Anna M. Peta	:	
Kenneth E. West	:	
Respondents.	:	

**MOTION TO EXTEND DEADLINE TO RESPOND TO TRUSTEE'S NOTICE OF
FINAL CURE PAYMENT (DOCKET NO. 326)**

PNC Bank, National Association ("Creditor") by and through undersigned counsel and respectfully moves this Court for an Order to extend the response deadline for Trustee's Notice of Final Cure Payment. Creditor avers as follows:

1. Creditor entered into a Consent Order with Debtor regarding its Proof of Claim No. 7 on August 29, 2023 at Docket No, 272 as approved by the Court on August 30, 2023 at Docket No. 273.
2. The Chapter 13 Trustee filed a Notice of Final Cure Payment (“Notice”) on January 11, 2024 at Docket No.326. The response to the Trustee’s Notice is due on February 1, 2024.
3. Consent Order needs to be amended to allow an accurate response to the Trustee’s Notice. Debtor’s counsel agrees to the amendment of the Consent Order and the request to extend the deadline to respond to the Notice.

WHEREFORE, Creditor requests that the deadline to respond to Trustee's Notice of Final Cure Payment be extended from February 1, 2024 to March 2, 2024 to allow Creditor time to amend the Consent Order and properly respond to Trustee's Notice

Respectfully submitted,

/s/Alyk L. Oflazian

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CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Motion to Extend Deadline to Respond to Trustee's Notice of Final Cure Payment was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

Ronald G. McNeil ,Esquire, Attorney for Frank J. Peta, Jr., r.mcneil1@verizon.net

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Frank J. Peta, Jr., 68 Madison Avenue, Bala Cynwyd, PA 19004

Anna M. Peta, 68 Madison Ave, Lower Merion Twp, PA 19004

/s/Alyk L. Oflazian
